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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors ¹ .	: (Jointly Administered)
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**TWENTIETH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF
MAY 1, 2021 THROUGH AND INCLUDING MAY 31, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	May 1, 2021 – May 31, 2021
Total Amount of Fees Incurred:	\$75,504.50
Total Fees Requested (80%):	\$60,403.60
Total Reimbursement of Expenses Incurred:	\$0.00
Total Reimbursement of Expenses Requested (100%):	\$0.00
Total compensation and Reimbursement Requested in this Statement:	\$60,403.60
This is Applicant's:	Twentieth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Twentieth Monthly Fee Statement (the "Fee Statement") for the period of May 1, 2021 – May 31, 2021 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$75,504.50 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$60,403.60.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,198.16². The Blended hourly rate of all paraprofessionals is \$325.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Applicant did not incur any expenses during the Statement Period.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$60,403.60, which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in connection with such services during the Statement Period (*i.e.*, \$75,504.50).

² The blended hourly billing rate of \$1,198.16 is derived by dividing the total fees for attorneys of \$75,244.50 by the total hours of 62.8.

³ The Blended hourly billing rate of \$325.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$260.00 by the total hours of .8.

Dated: July 15, 2021
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU04	Case Administration	1.7	\$1,521.50
PU05	Claims Analysis	.2	\$280.00
PU08	Litigation: Contested Matters, Adversary	1.4	\$1,960.00
PU09	Meetings and Communications w/ AHC	13.0	\$15,523.50
PU11	Plan & Disclosure Statement	47.3	\$56,219.50
	TOTALS:	63.6	\$75,504.50

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	37.7	\$52,780.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	25.1	\$22,464.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	.8	\$260.00
	TOTAL		63.6	\$75,504.50

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

July 14, 2021
BILL NO. 217693

For Services Rendered Through May 31, 2021:

Phase: PU04	CASE ADMINISTRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/21 JSF	Telephone Call(s) Participate in Omnibus Hearing re: Status and Other Pending Matters	1.50	1,342.50
05/21/21 JSF	Examine Documents Review of Case Updates to AHC	.20	179.00
TOTAL PHASE PU04		1.70	\$1,521.50

Phase: PU05	CLAIMS ANALYSIS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/21 MLC	Correspondence Correspondence with Brattle re medicaid allocation breakouts by state	.20	280.00
TOTAL PHASE PU05		.20	\$280.00

Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/18/21 MLC	Conference call(s) Conference call with NCSG and AHC counsel re response to discovery by School Districts	.80	1,120.00
05/18/21 MLC	Conference call(s) Conference call with States subgroup and counsel re discovery requests by School Districts	.60	840.00
TOTAL PHASE PU08		1.40	\$1,960.00

Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/04/21 MLC	Conference call(s) Conference call with Ad Hoc counsel with certain State representatives concerning various Plan and Sackler release issues	.80	1,120.00
05/05/21 JSF	Telephone Call(s) Participate in Weekly Call of AHC	1.40	1,253.00
05/05/21 MLC	Conference call(s) Conference call meeting with AHC members and counsel	1.10	1,540.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/21 JSF	Telephone Call(s) Participate in Meeting of AHC re: Status of Plan Negotiations and Open Issues	.80	716.00
05/10/21 MLC	Conference call(s) Conference call with AHC and counsel to review objections to disclosure statement and related issues	1.80	2,520.00
05/11/21 JSF	Examine Documents Review of Update to AHC with Recently Filed Motions	.30	268.50
05/11/21 MLC	Conference call(s) Conference call with certain State representatives to review objections to DS/POR	.80	1,120.00
05/19/21 JSF	Telephone Call(s) Participate in Weekly Videoconference with AHC	1.10	984.50
05/19/21 MLC	Conference call(s) Conference call meeting with AHC and counsel re status of pending matters	1.20	1,680.00
05/24/21 JSF	Telephone Call(s) Participate in AHC Videoconference re: Status of Plan and Disclosure Statement	1.70	1,521.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/24/21 MLC	Conference call(s) Conference call with AHC Committee re plan components and open issues	2.00	2,800.00
TOTAL PHASE PU09		13.00	\$15,523.50

Phase: PU11	PLAN & DISCLOSURE STATEMENT
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/21 MLC	Analysis of Memorandum Review of amended DS for first amended plan filed by debtors	1.10	1,540.00
05/01/21 MLC	Correspondence Correspondence between NCSG and AHC state subgroups re document repository term sheet	.30	420.00
05/02/21 MLC	Correspondence Correspondence with NAS ad hoc re presentation by NAS of their claim	.20	280.00
05/03/21 MLC	Correspondence follow-up correspondence with Brattle re state by state allocation breakout of medicaid	.40	560.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/21 MLC	Correspondence Correspondence with state subgroup re outstanding issues re document repository term sheet	.30	420.00
05/04/21 JSF	Examine Documents Review of Outstanding Plan Issues and Positions of UCC and AHC	.60	537.00
05/04/21 MLC	Conference call(s) Conference call with AHC counsel and States subgroup re claims negotiations	.60	840.00
05/05/21 JSF	Examine Documents Review of Draft Response to Objections of School Districts and W. Virginia to Disclosure Statement	.40	358.00
05/06/21 JSF	Examine Documents Plan - Review of Open Issues and Status of DS Hearing	.60	537.00
05/06/21 MLC	Conference call(s) Conference call with States subgroup and AHC counsel re claims negotiatoins	.60	840.00
05/07/21 MLC	Analysis of Memorandum Review of summary analysis prepared by KL concerning mediation order, amendments to DS and Plan, and additional objections to amended plan/DS	.90	1,260.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/21 MLC	Analysis of Memorandum Review of blackline of second amended DS	2.20	3,080.00
05/09/21 MLC	Analysis of Memorandum Review of memo prepared by KL concerning amendments to various TDPs	.90	1,260.00
05/10/21 JSF	Examine Documents Review of Open Issue - Attorneys' Fees Proposal for Private and Public Creditors	.20	179.00
05/10/21 JSF	Examine Documents Review Draft of AHC Response to Disclosure Statement Objections	.40	358.00
05/10/21 MLC	Analysis of Memorandum Reviewed objections filed by various parties	2.20	3,080.00
05/11/21 JSF	Telephone Call(s) Call with Tribes, NCSG, MSGE and AHC re: Open Plan Issues	.70	626.50
05/11/21 MLC	Conference call(s) Conference call with TLC/NCSG/AHC re discussion about fee requests and allotments by various parties	.80	1,120.00
05/12/21 JSF	Telephone Call(s) Participate in Court Hearing re: Disclosure Statement Procedures	1.10	984.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/12/21 MLC	Court Appearance - General Court hearing concerning DS and confirmation procedures	1.50	2,100.00
05/13/21 JSF	Examine Documents Review and Update of Remaining DS Objections	.40	358.00
05/13/21 MLC	Conference call(s) Conference call with certain states' representatives re open issues and next steps	1.00	1,400.00
05/13/21 MLC	Examine Documents Review and update of remaining DS objections	.70	980.00
05/13/21 MLC	Examine Documents Review of scheduling order regarding plan and confirmation hearing	.30	420.00
05/13/21 MLC	Correspondence Correspondence with Gilbert firm re prior negotiations with various third parties	.40	560.00
05/13/21 JKH	Diary & Docket Review scheduling order regarding plan and confirmation and calendar multiple deadlines and hearing dates	.80	260.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/14/21 MLC	Conference call(s) Conference call with States working group to review open issues	1.00	1,400.00
05/14/21 MLC	Analysis of Memorandum Memo from KL re public schools' discovery requests	.60	840.00
05/17/21 JSF	Telephone Call(s) Call with Working Group of AHC re: Open Plan Issues and Status	.60	537.00
05/17/21 JSF	Examine Documents Review of Revised AHC Response to DS Objections	.40	358.00
05/17/21 JSF	Examine Documents Review of Plan and Disclosure Statement	1.20	1,074.00
05/17/21 MLC	Conference call(s) Conference call with certain states and AHC counsel re update re DS objections	.50	700.00
05/17/21 MLC	Analysis of Memorandum Reviewed and analyzed memo prepared by KL summarizing proposed revisions to plan	1.10	1,540.00
05/18/21 JSF	Examine Documents Review of Information Sharing Protocol with Debtors re: Discovery Requests of Third Parties	.80	716.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/18/21 JSF	Examine Documents Review of AHC Comments to Plan	.40	358.00
05/18/21 MLC	Correspondence Correspondence re proposed settlement of indemnity issues	.50	700.00
05/18/21 MLC	Analysis of Memorandum Review and analysis of draft plan revisions by debtors	1.20	1,680.00
05/20/21 MLC	Court Appearance - General Appeared in court in connection with adjournment of disclosure statement hearing	1.40	1,960.00
05/21/21 JSF	Telephone Call(s) Participate in Call with AHC and NCSG re: Public Schools' Discovery Requests	.90	805.50
05/21/21 JSF	Examine Documents Review of Discovery Requests fro Public Schools	.40	358.00
05/21/21 MLC	Conference call(s) Conference call with AHC counsel and NCSG counsel concerning public schools discovery requests	1.00	1,400.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/21 MLC	Correspondence Correspondence with KL litigation team regarding the final agreement re Purdue information sharing protocol	.40	560.00
05/21/21 MLC	Analysis of Memorandum Review of KL analysis of public schools' discovery requests	1.10	1,540.00
05/23/21 JSF	Examine Documents Review of Presentation to AHC re: Plan Overview	.60	537.00
05/23/21 MLC	Analysis of Memorandum Review and analysis of KL memo re remaining open plan issues	1.20	1,680.00
05/24/21 JSF	Examine Documents Review of Presentation on Key Plan Issues	.40	358.00
05/24/21 JSF	Examine Documents Review of Third Amended Plan Revisions as Filed	.60	537.00
05/24/21 JSF	Examine Documents Review of Responses to Disclosure Statement - Statements in Support and Objections Disclosure Statement	.80	716.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/24/21 MLC	Analysis of Memorandum Review of changes to Disclosure Statement by debtors	3.10	4,340.00
05/25/21 JSF	Examine Documents Review of Amended Plan and Open Issues for AHC	.80	716.00
05/26/21 JSF	Telephone Call(s) Participate Telephonically in Disclosure Statement Hearing	4.50	4,027.50
05/26/21 JSF	Examine Documents Review of Blacklines to Amended Plan	.50	447.50
05/28/21 JSF	Examine Documents Attention to Plan Issues re: Remaining Open Items	.80	716.00
05/28/21 MLC	Analysis of Memorandum Review of KL memo re remaining open issues	.90	1,260.00
TOTAL PHASE PU11		47.30	\$56,219.50
		TOTAL FOR SERVICES	\$75,504.50